# INFORMATION RELATIVE TO THE DRAFT TITLE V OPERATING PERMIT

FOR:

Masonite Corporation 1001 South 4th Avenue Laurel, MS 39440 July 1, 2008

## **FACILITY DESCRIPTION**

Masonite Corporation in Laurel, Mississippi is a manufacturing facility producing hardboard and softboard wood composites doorskins, softboard wood composites door cores, and plastic composites doorskins, The applicant's operations fall within SIC Code 2493. A Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law. The primary emission sources at this facility are detailed in Section 2 of the draft Title V Permit.

## TITLE V PROGRAM APPLICABILITY BASIS

This facility's potential to emit particulate matter, nitrogen oxides, volatile organic compounds, and hazardous organic pollutants (HAPs) exceeds the major source threshold of 100 tons per year that was established by the Title V program of the Clean Air Act.

## LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

- 1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including:
  - a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1) amended February 27, 2000,
  - b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3) amended April 25, 1988,
  - c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5) amended August 22, 1996, and 40 CFR Part 52.21 by reference, and
  - d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2) October 28, 1999, relating to construction permits and synthetic minor operating permits;

- 2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;
- 3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;
- 4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;
- 5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;
- 6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act:
- 7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act:
- 8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;
- 9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;
- 10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;
- 11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;
- 12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

#### CAM APPLICABILITY

CAM Plans are required for the "large pollutant-specific emissions units" (i.e., those with controlled emissions exceeding 100 percent of the major source threshold). Emission Points AB-102 (Line I and II dust collection system with baghouse), AI-102 (Line III Dust Collection System with baghouse), AD-011 (Baghouse for dust collection from sawing activities), AJ-011 (Cut/Coat Line II: First Saw, Second Saw, and Third Saw equipped with a single baghouse), AD-013 (Boiler Relay Baghouse), AE-003 (The Baghouse serving the Relay to the Boiler for AE-001, AE-002, AE-004, and AE-005), AE-001 (Door Core Processing: Three (3) Routers, Waste Hog & Lockblock system equipped with a baghouse), AE-006 (Door Core Processing Area Dust Bin for storing excess boiler fuel equipped with a baghouse), AE-004 (The 70" Hog (Cull Hardboard) equipped with a baghouse), AD-103 (Cut/Coat Line I with cyclonic separator and disposable filter), and AJ-103 (Cut/Coat Line II with cyclonic separator and disposable filter) are subject to 40 CFR 64, Compliance Assurance Monitoring. A copy of the facility's CAM plan has been incorporated into the permit as Conditions 5.B.52 and 5.B.53 and as Appendix H. For Emission Points AB-102, AI-102, AD-011, AJ-011, AD-013, AE-003, AE-001, AE-006, and AE-004, CAM for all baghouses stipulates weekly Method 9 observations. The 6 minute Method 9 observation will be performed only as necessary.

Emission Points AM-006 (Grapical Door Line Rotor Concentrator with thermal oxidizer), AN-001 (Sheet Mold Compound Line with RTO), AB-009 (Line 1 Coe Wicket Oven with RTO), AC-009 (Line 2 Coe Wicket Oven with RTO), and AI-008 (Line 3 Wicket Oven) are subject ot CAM due to VOC emissions in excess of 100 tpy uncontrolled emissions. These units are subject to MACT standards which require parametric monitoring which meets CAM requirements.

Emission Points BB-003 (258 MMBTU/hr rated heat input burning natural gas and wood fuel, equipped with a cyclone and an electrostatic precipitator) and BB-004 (258 MMBTU/hr rated heat input burning natural gas and wood fuel, equipped with a cyclone and an electrostatic precipitator) have emissions which exceed 100 percent of the major source threshold. On August 1, 2008, Masonite disclosed that these units will be removed in order for the facility to achieve compliance with MACT DDDD. This plan was submitted in accordance with Mississippi Commission on Environmental Quality V. Masonite Corporation Agreed Order No. 5339 07. The proposed TVOP stipulates the facility will comply with the plan submitted in accordance with Mississippi Commission on Environmental Quality V. Masonite Corporation Agreed Order No. 5339 07 and any subsequent order which may be necessary due to the 8/1/2008 submittal.

#### MACT APPLICABILITY

Emission Points AL-008 and AL-009 shall comply with all applicable requirements and limitations of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW. Emission Points AL-010, AL-011, AL-012, AL-013, AL-014, AL-015, AN-001, and AN-002 shall comply with the NESHAP upon start-up.

Emission Points AD-102, AD-103, AJ-102, AJ-103, AM-001, AM-002, AM-003, AM-004, AM-005 and AM-006 shall comply with all applicable requirements and limitations of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ.

On June 8, 2007, the Boiler MACT, Subpart DDDDD was vacated by the United States Court of Appeals in Washington DC. Therefore, no Boiler MACT language has been incorporated into the draft permit. MDEQ is awaiting guidance on whether the vacature of this rule triggers the provisions of 112(j). Currently, MDEQ does not believe this provision applies. If future EPA guidance is provided which demonstrates otherwise, or if a new subpart is promulgated which takes the place of Subpart DDDDD, this permit will be reopened to include such language.

Emission Points AB-101, AB-007, AB-009, AC-101, AC-007, AC-009, AI-101, AI-005, and AI-008, are subject to the requirements of 40 CFR Part 63, Subpart DDDD, the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. The permittee shall submit a compliance plan addressing all applicable emission limits, monitoring, recordkeeping and reporting requirements no later than six months prior to the compliance date of the rule. A request to modify the TVOP should be submitted with the compliance plan. Once the compliance plan and request to modify is received, the MDEQ will modify the permit to either incorporate the applicable requirements into the permit with a remaining permit term of 3 or more years or will attach it as an appendix until such time the permit is modified. (Ref: 40 CFR 63.2231)

### SPECIFIC APPLICABLE REQUIREMENTS

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AB-007 Line 1	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	23.80 lbs/hr and 104.23 tons/year
Press Vent	and July 27, 2001	Weekly, EPA Reference Method 9 for Opacity monitoring	VOC	11.61 lb/hr and 50.83 tons/year
AB-009 Line 1 Natural Gas Oven	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and modified in	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	0.9 lbs/hr and 3.5 tons/year
	TV issued December 31, 2003, September 23, 2004, August 25, 2005, and modified in Federally Enforceable Permit to Construct issued February 12, 2007.		VOC	0.6 lbs/hr and 2.3 tons/year
	APC-S-1 Section 3.4(a)(1)		PM	0.6 lb/MMBTU
	APC-S-1 Section 4.1(a)		SO <sub>2</sub>	4.8 lb/MMBTU
AB-101 Line I First	Federally Enforceable Permit to Construct issued February 25,	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	9.08 lbs/hr and 39.76 tons/year

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
Stage Dryer	1997, modified July 20, 2000 and July 27, 2001	Weekly, EPA Reference Method 9 for Opacity monitoring Weekly maintenance inspections	VOC	22.08 lb/hr and 96.73 tons/year
AB-102 Line I and II Dust Collection System	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring Weekly monitoring and recordkeeping of the pressure drop across the baghouse Weekly maintenance inspection	PM/ PM <sub>10</sub>	3.54 lbs/hr and 15.51 tons/year
AC-007 Line II	Federally Enforceable Permit to Construct issued February 25,	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	9.0 lbs/hr and 39.42 tons/year
Press Vent	T 1997 modified filly 20 2000	Weekly, EPA Reference Method 9 for Opacity monitoring	VOC	16.61 lb/hr and 72.76 tons/year
AC-009 Line II	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000,	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	0.9 lbs/hr and 3.5 tons/year
Natural Gas Oven	July 27, 2001, and modified in TV issued December 31, 2003, September 23, 2004, August 25, 2005 and modified in Federally Enforceable Permit to Construct issued February 12, 2007.		VOC	0.6 lbs/hr and 2.3 tons/year
	APC-S-1 Section 3.4(a)(1)		PM	0.6 lb/MMBTU
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AC-101 Line II	Federally Enforceable Permit to Construct issued February 25,	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	9.60 lbs/hr and 42.04 tons/year
First & Second Stage Dryers	First & Second Stage 1997, mounted July 20, 2000	Weekily, EPA Reference Method 9 for Opacity monitoring Weekly maintenance inspections	VOC	18.55 lb/hr and 81.27 tons/year
AD-101	APC-S-1 Section 3.4(a)(1)	No monitoring required for PM and SO <sub>2</sub> due to anticipated high margin of	PM	0.6 lb/MMBTU
Cut/Coat Line I Preheat and IR Ovens  APC-S-1 Section 4.1(a	APC-S-1 Section 4.1(a)	compliance with limitations based on using natural gas.	$SO_2$	4.8 lb/MMBTU
Natural Gas Fired				

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AD-102 Cut/Coat Line I HVHA Ovens (3)	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and modified December 31, 2003.	Biennial compliance testing for VOC	VOC	3.40 lbs/hr and 14.87 tons/year
Natural Gas Fired	APC-S-1 Section 3.4(a)(1)		PM	0.6 lb/MMBTU
GasTired	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AD-103 Cut/Coat	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	5.8 lbs/hr and 25.4 tons/year
Line I Spray Booths (3)	and July 27, 2001	Weekly maintenance inspections	VOC	6.43 lbs/hr and 28.15 tons/year
AD-104  Dust Collection System Cut/Coat Line I	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring Weekly monitoring and recordkeeping of the pressure drop across the baghouse Weekly maintenance inspection	PM/ PM <sub>10</sub>	1.48 lbs/hr and 6.48 tons/year
AE-001 Door Core	Federally Enforceable Permit to Construct issued February 25,	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for	PM/ PM <sub>10</sub>	1.30 lbs/hr and 5.69 tons/year
Processing w/ baghouse	1997, modified July 20, 2000 and July 27, 2001	Opacity monitoring  Weekly monitoring and recordkeeping of the pressure drop across the baghouse  Weekly maintenance inspection	Operational Restriction	Emission Point AE-001 shall not be operated without the baghouse.
AE-002  Door Core Processing  w/ baghouse	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring Weekly monitoring and recordkeeping of the pressure drop across the baghouse	PM/ PM <sub>10</sub>	0.25 lbs/hr and 1.10 tons/year
		Weekly maintenance inspection  Not currently installed	Operational Restriction	Emission Point AE-002 shall not be operated without the baghouse.
	Federally Enforceable Permit to Construct issued March 13, 1990, modified February 26, 1991.		PM/ PM <sub>10</sub>	0.50 lbs/hr and 2.2 tons/year

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AE-004 70" Hog w/ baghouse	Federally Enforceable Permit to Construct issued March 13, 1990, modified February 26, 1991.	One time compliance testing for PM/PM <sub>10</sub>	PM/ PM <sub>10</sub>	0.07 lbs/hr and 0.3 tons/year
AE-005  Door Core Processing w/ baghouse	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring  Weekly monitoring and recordkeeping of the pressure drop across the baghouse  Weekly maintenance inspection	PM/ PM <sub>10</sub> Operational Restriction	13.92 lbs/hr and 60.96 tons/year  Emission Point AE-005 shall not be operated without the baghouse.
AE-006  Door Core Processing Area Dust Bin w/ baghouse	Federally Enforceable Permit to Construct issued March 17, 2000	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring  Weekly monitoring and recordkeeping of the pressure drop across the baghouse  Weekly maintenance inspection	PM/ PM <sub>10</sub>	0.34 lbs/hr and 1.5 tons/year
AH-104 Preheat and HVHA Ovens Natural Gas Fired	APC-S-1 Section 3.4(a)(1)  APC-S-1 Section 4.1(a)	No monitoring required for PM and SO <sub>2</sub> due to anticipated high margin of compliance with limitations based on using natural gas	PM SO <sub>2</sub>	0.6 lb/MMBTU 4.8 lb/MMBTU
AI-005 Line III Press Exhaust w/ cyclone	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001, and in TV issued August 25, 2005.	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	21.17 lbs/hr and 92.74 tons/year when running phenol formaldehyde (PF)
			VOC	12.0 lbs/hr and 52.56 tons/year when running phenol formaldehyde (PF)
AI 005 Cont.	Federally Enforceable Title V Permit to Operate issued August 25, 2005		PM/ PM <sub>10</sub>	4.0 lbs/hr not to exceed 3.39 tons/year when running urea formaldehyde (UF)

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
			VOC	6.2 lbs/hr not to exceed 5.27 tons/year when running urea formaldehyde (UF)
AI-008 Line III Natural Gas Oven	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and modified in TV issued December 31, 2003, September 23, 2004, August 25, 2005 and modified in Federally Enforceable Permit to Construct issued February 12, 2007.	Biennial compliance testing for PM/PM <sub>10</sub> and VOC	PM/ PM <sub>10</sub>	1.3 lbs/hr and 4.9 tons/year
			VOC	0.9 lbs/hr and 3.4 tons/year
	APC-S-1 Section 3.4(a)(1)		PM	0.6 lb/MMBTU
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AI-101 Line III First & Second Stage Dryers	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and in TV issued August 25, 2005.	Biennial compliance testing for PM/PM <sub>10</sub> and VOC due 12/31/04  Weekily, EPA Reference Method 9 for Opacity monitoring  Weekly maintenance inspections	PM/ PM <sub>10</sub>	12.94 lbs/hr and 56.69 tons/year, when running phenol formaldehyde (PF)
			VOC	31.49 lb/hr and 137.92 tons/year, when running phenol formaldehyde (PF)
	Federally Enforceable Title V Permit to Operate issued August 25, 2005		PM/ PM <sub>10</sub>	12.9 lbs/hr not to exceed 10.9 tons/year when running urea formaldehyde (UF)
			VOC	38.8 lb/hr not to exceed 32.0 tons/year, when running urea formaldehyde (UF)

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AI-102 Line III Dust Collection System	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring  Weekly monitoring and recordkeeping of the pressure drop across the baghouse  Weekly maintenance inspection	PM/ PM <sub>10</sub>	1.85 lbs/hr and 8.10 tons/year
AJ-011 Cut/Coat Line II w/ baghouse	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and August ?, 2008	One time compliance testing for PM/PM <sub>10</sub> Weekly Visible Emissions Evaluation for Opacity monitoring Weekly monitoring and recordkeeping of the pressure drop across the baghouse Weekly maintenance inspection	PM/ PM <sub>10</sub>	0.60 lbs/hr and 2.3 tons/year
AJ-101  Cut/Coat Line II Preheat and IR Ovens  Natural Gas Fired	APC-S-1 Section 3.4(a)(1)	No monitoring required for PM and SO <sub>2</sub> due to anticipated high margin of compliance with limitations based on using natural gas.	PM	0.6 lb/MMBTU
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AJ-102 Cut/Coat Line II HVHA Ovens (3)	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and modified December 31, 2003.	Biennial compliance testing for  No monitoring required for PM and SO <sub>2</sub> due to anticipated high margin of compliance with limitations based on using natural gas	VOC	2.95 lbs/hr and 12.91 tons/year
Natural Gas Fired	APC-S-1 Section 3.4(a)(1)		PM	0.6 lb/MMBTU
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AJ-103  Cut/Coat  Line II  Spray  Booths (3)	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000 and July 27, 2001	Biennial compliance testing for PM/PM <sub>10</sub> and VOC Weekly maintenance inspections	PM/ PM <sub>10</sub>	5.8 lbs/hr and 25.4 tons/year
			VOC	10.26 lbs/hr and 44.95 tons/year
BB-001 233	Permit to Operate issued June 9, 1992 and modified in TV issued September 23, 2004, and August	One Time compliance testing for PM/PM <sub>10</sub> Weekily, EPA Reference Method 9 for	PM	2.16 lbs/hr and 9.46 tons/year
MMBTU/ HR Boiler	25, 2005	Opacity monitoring Weekly maintenance inspections	$SO_2$	3.42 lbs/hr and 14.98 tons/year

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
Natural Gas Only		Monthly monitoring and recordkeeping of fuel type, quantity, and heating value	NOx	79.80 lbs/hr and 349.52 tons/year
			СО	21.0 lbs/hr and 91.98 tons/year
			VOC	1.56 lbs/hr and 6.83 tons/year
			Fuel Restriction	Fuels other than natural gas are prohibited.
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
	APC-S-1 Section 3.4(a)(2)		PM	E = 0.8808 * I <sup>-</sup>
BB-003  258  MMBTU/ HR  Wood fuel & Natural Gas Boiler	Federally Enforceable Permit to Construct issued March 10, 1981 and Federally Enforceable Permit to Construct issued December 6, 2005 and modified October 9, 2006.	Biennial compliance testing for PM/PM <sub>10</sub> Weekily, EPA Reference Method 9 for Opacity monitoring  Weekly maintenance inspections  Monthly monitoring and recordkeeping of fuel type, quantity, and heating value	PM	18.0 lbs/hr and 78.8.5 tons/year
			Operational Restriction	The electrostatic precipitator shall be operated at any time wood fuel is being burned as fuel.
	APC-S-1 Section 3.4(b)		PM	0.30 grains/dscf
	APC-S-1 Section 3.4(a)(2)		PM	E = 0.8808 * I <sup>-</sup>
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
	Title V Permit to Operate issued October 16, 2002		Fuel Restriction	Fuels other than wood fuel and natural gas are prohibited.

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
BB-003 Cont.	Title V Permit to Operate issued October 16, 2002		Wood fuel	Wood fuel is defined as purchased bark, sawdust, fines, and manufacturing process waste including hardboard, softboard, finished product, trim, chips, dust, fiber, sludge (residuals from screening and primary clarification)
BB-004  258  MMBTU/ HR Wood fuel & Natural Gas Boiler	Federally Enforceable Permit to Construct issued March 10, 1981	Biennial compliance testing for PM/PM <sub>10</sub> Weekily, EPA Reference Method 9 for Opacity monitoring Weekly maintenance inspections Monthly monitoring and recordkeeping of fuel type, quantity, and heating value	PM	18.0 lbs/hr and 78.8 tons/year
			Operational Restriction	The scrubber shall be operated at any time wood fuel is being burned as fuel.
	APC-S-1 Section 3.4(b)		PM	0.30 grains/dscf
	APC-S-1 Section 3.4(a)(2)		PM	E = 0.8808 * I <sup>-</sup>
	APC-S-1 Section 4.1(a)		SO <sub>2</sub>	4.8 lb/MMBTU
	Title V Permit to Operate issued October 16, 2002		Fuel Restriction	Fuels other than wood fuel and natural gas are prohibited.

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
			Wood fuel	Wood fuel is defined as purchased bark, sawdust, fines, and manufacturing process waste including hardboard, softboard, finished product, trim, chips, dust, fiber, sludge (residuals from screening and primary clarification)
AL-008 AL-009 AL-010 AL-011 AL-012 AL-013 AL-014 AL-015 AN-001 AN-002 Thermoplastic Door Skin Production	APC-S-1, Section 8.1 & NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	Compliance reporting  Work Practice Standards	HAPs	See Condition 3.B.18
AL-008	Federally Enforceable PSD Permit to Construct issued January 28, 2005	General Compliance Requirements  Compliance Demonstration, Recordkeeping	VOC	3.56 lbs/hr and 15.6 tons/year
AL-009	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	3.56 lbs/hr and 15.6 tons/year
AL-010	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	3.56 lbs/hr and 15.6 tons/year
AL-011	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	1.78 lbs/hr and 7.8 tons/year
AL-012	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	1.78 lbs/hr and 7.8 tons/year
AL-013	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	1.78 lbs/hr and 7.8 tons/year

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AL-014	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	1.78 lbs/hr and 7.8 tons/year
AL-015	Federally Enforceable PSD Permit to Construct issued January 28, 2005		VOC	1.78 lbs/hr and 7.8 tons/year
AM-001 AM-002 AM-003 AM-004 AM-005	Federally Enforceable Permit to Construct issued February 23, 2004.		Operational Restriction	Emission points AM-001, AM- 002, AM-003, and AM-004 shall not be operated without the use of the simple filter — Supra II Mini- Mesh.
			VOC	Not to exceed a total combined emissions limitation of 28.90 lb/hr, not to exceed 60.20 tons/year
			PM/ PM <sub>10</sub>	Not to exceed a total combined emissions limitation of 2.78 lbs/hr, not to exceed 5.79 tons/year
AM-006 Rotor Concen-	Federally Enforceable Permit to Construct issued February 23, 2004.	Biennial Compliance Testing Weekly Visible Emissions Evaluation for Opacity monitoring	VOC	7.02 lb/hr, not to exceed 14.62 tons/year
trator with Thermal		Operation without the Roto Concentrator with Thermal Oxidizer is not possible.	Opacity	Not to exceed 40%

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
Oxidizer		There is no by-pass	Operational	Topcoat Spray
		Combustion Temperature for RTO	Restriction	Booth No. 1,
		Startup, Shutdown, and Malfunction Plan(SSMP)		Topcoat Spray Booth No. 2, and the Drying
		Compliance with applicable emission limits		Chamber shall
		Recordkeeping		not be operated without the use
		Dates for:		of the Regenerative
		Performance Test of Capture Systems		Thermal Oxidizer
		Develop Work Practice Plan		
		Initial Compliance Demonstration		
		Continuous Compliance		
		Performance Test		
		Emission Capture System efficiency		
		Add-on control emission destruction and removal efficiency		
		RTO Operating Limits		
		Concentrator Operating Limits		
		Emission Capture System Operating Limits		
		CPMS Recordkeeping		
		RTO Monitoring		
		Concentrator Monitoring		
		Emission Capture System Monitoring		
AM-001 AM-002	National Emission Standards for Hazardous Air Pollutants for	Recordkeeping in accordance with \$63.4730	НАР	1.93 lb HAP/gal solid
AM-003 AM-004 AM-005	Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ.	Initial Compliance Demonstration in accordance with §63.4750 and §63.4751		
AM-006	55, Suspan & & & .	Continuous Compliance in accordance with §63.4752 and §63.4731		
AD-102 AD-103		Recordkeeping in accordance with \$63.4730		0.06 lb HAP/gal solid
AJ-102 AJ-103		Initial Compliance Demonstration in accordance with §63.4750 and §63.4751		
		Continuous Compliance in accordance with §63.4752 and §63.4731		

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AM-001 AM-002 AM-003 AM-004 AM-005 AM-006 AM-007	Federally Enforceable Permit to Construct issued February 23, 2004.	Record the amount of doors processed per day and the total combined throughput expressed as doors/year on both a daily basis and a consecutive 365 day total.	Annual Throughput Limitation	For Emission Points AM-001 through AM-007, the permittee shall not exceed a throughput of 750,000 doors per year in any consecutive 365- day period.
AN-001 AN-002	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW, 63.5805(d)(1)	Testing and Initial Compliance Requirements	HAPs	Reduce the total organic HAP emissions from SMC manufacturing by at least 95 percent by weight
AN-001	Federally Enforceable PSD Permit to Construct issued	Testing and Initial Compliance Requirements	VOC	4.9 lbs/hr and 13.6 tons/year
	January 28, 2005, modified in TV issued August 25, 2005		Opacity	Not to exceed 40%
AM-008 AM-009 AM-010 AM-013 AM-014 AM-015	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ.	Recordkeeping in accordance with \$63.4730  Initial Compliance Demonstration in accordance with \$63.4750 and \$63.4751  Continuous Compliance in accordance with \$63.4752 and \$63.4731	HAPs	0.06 lb HAP/gal solid
AM-008 AM-009 AM-010 AM-013 AM-014	Federally Enforceable Permit to Construct issued December 5, 2005.	Record the amount of doors processed per day and the total combined throughput expressed as doors/year on both a daily basis and a consecutive 365 day total	Annual Throughput Limitation	For Emission Points AM-008 through AM-014, the permittee shall not exceed a throughput of 1,576,800 doors per year in any consecutive 365- day period.
AM-010	Federally Enforceable Permit to Construct issued December 5, 2005		VOC	10.8 lb/hr, not to exceed 14.2 tons/year
AM-013	Federally Enforceable Permit to Construct issued December 5, 2005		VOC	7.2 lb/hr, not to exceed 9.5 tons/year

Emission Point(s)	Applicable Requirement	Monitoring/Recordkeeping Requirement	Pollutant/ Parameter	Limit/Standard
AM-015	Federally Enforceable Permit to Construct issued December 5, 2005 and Modified on October 9, 2006		Fuel Restriction	Fuels other than Natural Gas are prohibited.
	Federally Enforceable Permit to Construct issued December 5, 2005 and Modified on October 9, 2006		PM	18.0 lbs/hr and 78.8 tons/year
	APC-S-1 Section 4.1(a)		$SO_2$	4.8 lb/MMBTU
AB-009 AC-009 AI-008	Federally Enforceable Permit to Construct Issued February 12, 2007.		VOC	Reduce VOC emissions by at least 95%
AP-101	Federally Enforceable Permit to Construct Issued February 12, 2007 and modified on November 2, 2007.		VOC	52.3 lbs/hr and 30.0 tons/year
	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ.		HAPs	0.06 lb HAP/gal solid

## OTHER LIMITS:

The permitee shall comply with all conditions and compliance schedules described in Mississippi Commission on Environmental Quality V. Masonite Corporation Agreed Order No. 5339 07. Upon submittal of the compliance plan required in accordance MACT Subpart DDDD and submitted as required by Mississippi Commission on Environmental Quality V. Masonite Corporation Agreed Order No. 5339 07, the Department will initiate review of the air construction permitting action in order for Masonite to become fully compliant with MACT Subpart DDDD.